

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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MILLERCOORS, LLC,

Plaintiff,

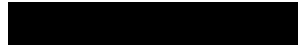
v.

ANHEUSER-BUSCH COMPANIES, LLC,

Defendant.

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Case No. 19-cv-218-WMC



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**Declaration of Kendall W. Harrison in Support of Anheuser-Busch Companies, LLC's  
Motion for Summary Judgment**

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I, Kendall W. Harrison, do hereby declare and state as follows:

I am an attorney duly licensed to practice law in the State of Wisconsin. I am competent to testify as to all matters stated and, if called upon to do so, I would testify to the facts set forth in this Declaration.

1. A true and correct copy of the email and attachment Bates labeled MC00018409-18422 is attached hereto as Exhibit 1.

2. A true and correct copy of the email and attachment Bates labeled MC00000261-268 is attached hereto as Exhibit 2.

3. A true and correct copy of AB Deposition Exhibit 90 is attached hereto as Exhibit 3.

4. A true and correct copy of AB Deposition Exhibit 10 is attached hereto as Exhibit 4.

5. A true and correct copy of the document Bates labeled MC00026318-26320 is

attached hereto as Exhibit 5.

6. A true and correct copy of AB Deposition Exhibit 137 is attached hereto as Exhibit 6.

7. A true and correct copy of the October 17, 2019 *Milwaukee Journal Sentinel* article “Miller-Budweiser battle over corn syrup now includes charges of corporate espionage,” which is available online at <https://www.jsonline.com/story/money/business/2019/10/17/millercoors-anheuser-busch-corn-syrup-battle-now-includes-charge-recipe-theft-miller-lite-bud-light/4012356002/>, is attached hereto as Exhibit 7.

8. A true and correct copy of the February 22, 2019 *Behind the Beer* post titled “Anheuser-Busch changes its tune – again – on purpose of new campaign,” AB Deposition Exhibit 138, is attached hereto as Exhibit 8.

9. A true and correct copy of the email and attachment Bates labeled MC00026036-26038 is attached hereto as Exhibit 9.

10. A true and correct copy of the email and attachment Bates labeled MC00010911, AB Deposition Exhibit 76, is attached hereto as Exhibit 10.

11. A true and correct copy of the email and attachment Bates labeled MC00010525, AB Deposition Exhibit 77, is attached hereto as Exhibit 11.

12. A true and correct copy of the email and attachment Bates labeled MC00010311, AB Deposition Exhibit 79, is attached hereto as Exhibit 12.

13. A true and correct copy of the email and attachment Bates labeled MC00015989-15991, AB Deposition Exhibit 80, is attached hereto as Exhibit 13.

14. A true and correct copy of the email and attachments Bates labeled MC00018280-18299 is attached hereto as Exhibit 14.

15. A compilation of true and correct copies of AB Deposition Exhibits 71, 73, 106, 107, 109, and 110 is attached hereto as Exhibit 15.

16. A true and correct copy of Exhibit C to the Expert Report of Brett Taubman, Ph.D. is attached hereto as Exhibit 16.

17. A true and correct copy of AB Deposition Exhibit 167 is attached hereto as Exhibit 17.

18. A true and correct copy of AB Deposition Exhibit 37 is attached hereto as Exhibit 18.

19. A true and correct copy of AB Deposition Exhibit 38 is attached hereto as Exhibit 19.

20. A true and correct copy of AB Deposition Exhibit 34 is attached hereto as Exhibit 20.

21. A true and correct copy of AB Deposition Exhibit 118 is attached hereto as Exhibit 21.

22. A true and correct copy of AB Deposition Exhibit 134 is attached hereto as Exhibit 22.

23. A true and correct copy of the document Bates labeled MC00015515, AB Deposition Exhibit 135, is attached hereto as Exhibit 23.

24. A true and correct copy of MillerCoors's Response to AB's Second Set of Interrogatories is attached hereto as Exhibit 24.

25. A true and correct copy of text messages between MillerCoors employee Joshua Edgar and an AB employee is attached hereto as Exhibit 25.

26. A true and correct copy of AB Deposition Exhibit 170 is attached hereto as

Exhibit 26.

27. A true and correct copy of AB Deposition Exhibit 171 is attached hereto as

Exhibit 27.

28. A true and correct copy of AB Deposition Exhibit 176 is attached hereto as

Exhibit 28.

29. A true and correct copy of AB Deposition Exhibit 177 is attached hereto as

Exhibit 29.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of October, 2019, in Madison, Wisconsin.

By: s/Kendall W. Harrison  
Kendall W. Harrison